Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket no. 95-116
	)	
Recommendations of the North American	)	
Numbering Counsel (NANC) for reducing	)	
the time interval for intermodal porting	)	

COMMENTS OF SYNIVERSE TECHNOLOGIES, INC.

I. Introduction

Syniverse Technologies ("Syniverse") submits these comments in response to the Federal Communications Commission ("FCC" or "Commission") September 16, 2004 Second Further Notice of Proposed Rulemaking requesting comment on reducing the time interval for intermodal porting (porting between wireline and wireless carriers) and comment on implementation issues in the event that a reduced porting interval is adopted. Syniverse urges the Commission to facilitate wireless-to-wireline porting in a manner that enhances competition and maximizes customer choice. Syniverse recommends the Commission carefully review the recommendations of the North American Number Counsel (NANC). Syniverse respectfully requests the FCC, in its review of the NANC recommendations, to consider guidelines intended to reduce the time interval for intermodal porting by establishing reliable validation criteria during the Confirmation Interval and simplifying the process to create an "acceptable" local service request (LSR). The Commission should consider guidelines that speed the creation of an "acceptable" LSR between intermodal trading partners by decreasing the number of data fields

validated by wireline carriers to three data fields; 1.) ported telephone number, 2.), account telephone number and, 3.) five-digit zip code. Syniverse respectfully requests one-year to implement a simplified LSR validation process. Syniverse believes that the intermodal porting process will improve considerably by creating a simple, reliable validation process facilitating the creation of an "acceptable" LSR.

Syniverse operates the largest inter-carrier communication (ICC) clearinghouse for local number portability (LNP) services in the United States. Syniverse provides many wireless carriers in the United States a local number portability (LNP) service bureau that stands above the rest. Our integrated solution makes it easy to implement and manage LNP by providing world-class flow-through automation that expedites number porting. For Syniverse, the biggest challenge to execute a successful intermodal port request, as demanded by our wireless customers, is the process of creating an "acceptable" local service request (LSR) for wireline carriers. The LSR validation process varies significantly between wireline carriers, where wireline carriers validate LSR data in anywhere from 3 to 10 data fields. Syniverse believes that the porting process will benefit if the validation criteria to create an "acceptable" LSR is simplified.

II. The NANC recommendations measures "port interval" from the point that an "acceptable" local service request (LSR) has been submitted; Syniverse believes that the FCC needs to consider the guidelines for creating an "acceptable" LSR.

The North American Numbering Counsel (NANC) recommendations, dated May 3, 2004 assumed that the wireline-porting interval is four (4) days measured from the point that an "acceptable" LSR has been submitted to the wireline service

provider.[1] The LSR process requires that the new service provider and the old service provider exchange information and agree on a due date to port the customer. Based on our experience with intermodal porting, Syniverse spends considerable time helping trading partners (our customers) exchange "acceptable" LSRs; or, LSRs that will pass the validation process of the wireline service providers. The creation of an "acceptable" LSR takes place before the confirmation and activation timers start. The LSR creation process can increase the overall porting time-interval by days. It is important to consider that after each LSR submission, a new "24-hour timer" starts to receive a "confirmation." Therefore, the current validation process associated with creation of an "acceptable" LSR can add days to the porting process.

Syniverse acknowledges that the porting process must accurately validate customer data before numbers are ported, however differing validation criteria between wireline carriers increases administrative burdens and impacts the overall porting interval. When an intermodal port request occurs (wireline to wireless), a local service request (LSR) is generated. Validating LSR data requires the wireless carrier to match data from the wireline customer record exactly, this process enables the request to pass the wireline provider system edits "confirming" the port request. For example, a wireline customer requests to port his/her number to a wireless carrier, the wireline carrier requires all LSR data to exactly match several "end user" data fields from the customer record in the validation process. Data fields validated by the wireline carriers can include "account telephone number" (ATN), "existing account telephone number" (EATN), "ported number" (ported NBR), "end user name" (EU Name), "end user address fields" (EU address fields),

[1] North American Numbering Counsel, Report and Recommendation, Intermodal Porting Intervals, Dated May 3, 2004, Page 6 of 35.

"migration indicator," "type of service" (TOS), and others. Information in these data fields contain misspellings and unique abbreviates that must be exactly replicated to create an "acceptable" LSR. Validating complex data requires 100% accuracy, and, depending on the wireline carrier, crosschecking data in 10 data fields adds complexity. Information in data fields must be formatted exactly to match the wireline carrier's data requirements, adding additional complexity. When errors occur, the wireline carrier declares that the LSR is "not acceptable" and rejects the port request. The process of correcting errors can involve many LSR submission attempts. Consequently developing an "acceptable" LSR is an iterative process that may require multiple LSR submissions. It is important for the FCC to consider that after each LSR submission, a new "24-hour timer" starts to receive a "confirmation." Therefore, it can take days to create an "acceptable" LSR. However, it is our experience that once an "acceptable" LSR is submitted the typical "confirmation" is received in less than 5 hours.

Syniverse believes that decreasing the number of data fields wireline carriers validate against will dramatically improve the administrative process used to create an "acceptable" LSR. The North American Numbering Counsel (NANC) discussed this in it's May 3, 2004 report[2], limiting validation criteria to four (4) data fields; ported number, social security number or account number or tax identification number, five-digit zip code, and PIN or PASS code, if applicable. Syniverse believes validating on three (3) data fields – ported telephone number, account telephone number (ATN) and five-digit zip code to create an "acceptable" LSR will be as effective and will have a dramatic, positive impact on overall porting time-intervals.

[2] North American Numbering Counsel, Report and Recommendation, Intermodal Porting Intervals, Dated May 3, 2004, Page 15 of 35.

III. NANC identified the information needed to validate and discussed the connection between LSR Validation and reducing porting intervals.

As discussed above, the current LSR validation processes vary greatly between wireline carriers. Syniverse is aware of wireline carriers that validate LSR data on anywhere from 3 to 10 distinct information points or "data fields" to facilitate the creation of an "acceptable" LSR. The current LSR creation process requires a great deal of communication between the trading partners and can take several days before an "acceptable" LSR order is generated. Syniverse believes that simplifying the validation criteria to three (3) data fields will shorten intermodal porting intervals and improve the consumer experience.

Based on our experience, certain carriers have already taken steps to limit the number of "data fields" they validate against. These carriers experience a decrease in LSR rejections and an increase in porting interval efficiency.

IV. Limiting LSR validation criteria will not increase the number of "inadvertent" ports.

LSR information must be reliable and accurate, Syniverse believes that simplifying the LSR process by reducing the number fields being validated will continue to insure that consumers are protected from "inadvertent" ports. For example, the probability of three validation points matching the wrong end user in error is extremely low. Based on our experience, validating on more than three fields does nothing more than determine that same end user information must be altered to match the wireline service provider's records before an LSR is accepted. In fact, inadvertent ports occur when a customer service record (CSR) is used to obtain

exact data, because the port administrator copy all fields from a CSR onto the LSR for the wrong end user.

V. COMPLIANCE

Syniverse Technologies respectfully requests that the Commission consider one year to allow the industry to comply with any rules or requirements to reduce the number of validation fields and improve the LSR creation process.

VI. CONCLUSION

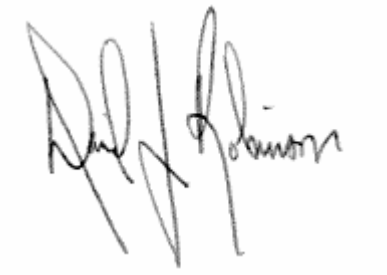
Syniverse urges the Commission consider improvements to the intermodal porting process that enhance competition and maximize customer choice. Syniverse believes that the intermodal porting process will improve considerably by creating a simplified, reliable validation process that speeds the creation of an "acceptable" local service request (LSR). Developing an "acceptable" LSR is an iterative process that can require multiple LSR submissions. Consider that after each LSR submission, a new "24-hour timer" starts to receive a "confirmation." Syniverse asks the FCC to support guidelines that limit LSR validation criteria to three (3) data fields, which will significantly speed the creation of an "acceptable" LSR. It is our experience that once an "acceptable" LSR is submitted the typical "confirmation" is received in less then 5 hours.

We agree with North American Numbering Counsel (NANC) that a reduction in the intermodal-porting intervals is feasible if all carriers used the same validation criteria. Simplifying validation criteria to three (3) data fields in the LSR (ported telephone number, account telephone number, and zip code) will greatly improve the overall porting request process and significantly reduce the amount of administrative time necessary to complete a port request. Certain wireline carriers

have already taken steps to limit the number of "data fields" validated and have increased their porting interval efficiency.

Syniverse respectfully requests the FCC consider guidelines for a reliable validation process that simplifies the creation of an "acceptable" LSR by reducing the validation criteria to three (3) data fields (i.e., ported number, account telephone number, and five-digit zip code). Syniverse Technologies respectfully requests that Commission allow the industry one year to comply with these changes to the validation process. We appreciate the FCC consideration of these issues and we look forward to working with the industry to improve the intermodal porting process.

Respectfully submitted this 16th Day of November 2004.



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